

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Jayco, Inc.
1200 North Detroit
LaGrange, Indiana 46761**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 087-7661-00019	
Issued by: Janet McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
B	GENERAL CONDITIONS	7
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-7-1]	
B.3	Permit Term [326 IAC 2-7-5(2)]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.6	Severability [326 IAC 2-7-5(5)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.8	Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]	
B.9	Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]	
B.10	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.11	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.12	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) & (13)] [326 IAC 2-7-6(1) & (6)]	
B.13	Emergency Provisions [326 IAC 2-7-16]	
B.14	Permit Shield [326 IAC 2-7-15]	
B.15	Multiple Exceedances [326 IAC 2-7-5(1)(E)]	
B.16	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.17	Permit Modification, Reopening, Revocation and Reissuance, or Termination	
B.18	Permit Renewal [326 IAC 2-7-4]	
B.19	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]	
B.20	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]	
B.21	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.22	Source Modification Requirement [326 IAC 2-7-10.5]	
B.23	Inspection and Entry [326 IAC 2-7-6(2)]	
B.24	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.25	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]	
C	SOURCE OPERATION CONDITIONS	19
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [326 IAC 6-3-2(c)]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-7-6(6)]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]	

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Assembly Lines, Spray Booth & Lamination 27

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.3 VOC Usage Limitation [326 IAC 8-2-9]
- D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.8 Particulate Matter (PM)
- D.1.9 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Woodworking Operation 31

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Particulate Matter (PM) [326 IAC 6-3]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.3 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.2.4 Visible Emissions Notations

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.5 Record Keeping Requirements

D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities 33

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-3-5]

D.3.2 Particulate Matter (PM) [326 IAC 6-3]

Certification Form 35

Emergency/Deviation Occurrence Report 36

Quarterly Report Form 38

Monthly Report Form 39

Semi-Annual Compliance Monitoring Form 40

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary recreational vehicle manufacturing source.

Responsible Official:	Larry Mast
Source Address:	1200 North Detroit, LaGrange, Indiana 46761
Mailing Address:	1200 North Detroit, LaGrange, Indiana 46761
SIC Code:	3792
County Location:	LaGrange
County Status:	Attainment for all criteria pollutants
Source Status	Part 70 Permit Program
	Minor Source, under PSD Rules;
	Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) custom spray booth, known as EU SB-1, installed in 1995, equipped with air-assisted airless and air atomization spray applicators, equipped with dry filters for PM control, exhausted through Stack P35-A, maximum capacity to support the assembly lines.
- (b) One (1) lamination operation, known as EU Lamination, installed in 1995, exhausted in the building interior, maximum capacity to support the assembly lines.
- (c) One (1) woodworking operation, known as EU W-1, equipped with a cyclone for PM control, installed in 1995, including saws, routers and milling equipment, exhausted through Stack P32-K, capacity: 2.0 tons of wood per hour.
- (d) One (1) recreational vehicle assembly line, known as EU L-10, installed in 1993, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.
- (e) One (1) recreation vehicle assembly line, known as EU L-21, installed in 1992, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches soldering equipment, welding equipment.
- (c) Any of the following structural steel and bridge fabrication activities: cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this

permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) & (13)] [326 IAC 2-7-6(1) & (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other

specifically identified requirements are not applicable.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation, except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and

reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (A) A brief description of the change within the source;
 - (B) The date on which the change will occur;
 - (C) Any change in emissions; and
 - (D) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

B.22 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-7-10.5.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

-
- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
 - (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
 - (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 14, 1998.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) custom spray booth, known as EU SB-1, installed in 1995, equipped with air-assisted airless and air atomization spray applicators, equipped with dry filters for PM control, exhausted through Stack P35-A, maximum capacity to support the assembly lines.
- (b) One (1) lamination operation, known as EU Lamination, installed in 1995, exhausted in the building interior, maximum capacity to support the assembly lines.
- (d) One (1) recreational vehicle assembly line, known as EU L-10, installed in 1993, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.
- (e) One (1) recreation vehicle assembly line, known as EU L-21, installed in 1992, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to CP 087-3429-00019, issued on January 17, 1995, the VOC delivered to the applicators of the lamination booth EU Lamination shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period.
- (b) The VOC emissions delivered to the applicators of the assembly line EU L-21 shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period.
- (c) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the facilities listed in (a) and/or (b) above, will make the facility subject to 326 IAC 8-1-6.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) The two assembly lines, EU L-10 and EU L-21, shall be limited to less than fifteen (15) pounds per day of VOC each, including coatings, dilution solvents, and cleaning solvents, when coating metal substrates. This usage limit makes 326 IAC 8-2-9 not applicable.
- (b) Any change or modification which may increase actual VOC usage when coating metal substrates to fifteen (15) pounds per day or more from these assembly lines will make the facilities subject to 326 IAC 8-2-9.

D.1.3 VOC Usage Limitation [326 IAC 8-2-9]

The input VOC usage in the custom spray booth, known as EU SB-1 shall be limited to less than fifteen (15) pounds per day and any change or modification which increases the VOC usage per day to fifteen (15) pounds or greater shall obtain a New Construction Permit before any such change may occur. Therefore, 326 IAC 8-2-9 does not apply.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 the PM from the assembly lines, EU L-10 and EU L-21, as well as the custom spray booth, EU SB-1, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate for one hundred (100) pounds per hour up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

- (a) Compliance with Condition D.1.1 shall be demonstrated at the end of each month for EU L-21 and EU Lamination based on the total volatile organic compound usage for the most recent 12 months.
- (b) Compliance with Condition D.1.2 shall be demonstrated at the end of each day for EU L-10 and EU L-21, based on the total volatile organic compound usage for the most recent day when coating metal substrates.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when spraying operations in the custom spray booth, known as EU SB-1, are being performed.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating spray booth Stack P35-A, when spraying operations in the custom spray booth, known as EU SB-1 are being performed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C -

Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly for EU Lamination and EU L-21 and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily for EU L-10 and EU L-21 shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day;
 - (4) The total VOC usage for each day; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.4, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) woodworking operation, known as EU W-1, equipped with a cyclone for PM control, installed in 1995, including saws, routers and milling equipment, exhausted through Stack P32-K, capacity: 2.0 tons of wood per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the wood-working facilities shall not exceed 6.52 pounds per hour when operating at a process weight rate of 2.0 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate of one hundred (100) pounds per hour up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the woodworking operation and its cyclone.

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

The cyclone for PM control shall be in operation at all times when the woodworking processes are in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the cyclone stack exhaust (Stack P32-K) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the cyclone stack exhaust.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches soldering equipment, welding equipment.
- (c) Any of the following structural steel and bridge fabrication activities:
Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) milli-

meters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate of one hundred (100) pounds per hour up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange, Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange, Indiana 46761
Part 70 Permit No.: T 087-7661-00019

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange, Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange, Indiana 46761
Part 70 Permit No.: T 087-7661-00019

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
 C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
 C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange Indiana 46761
Part 70 Permit No.: T 087-7661-00019
Facility: EU Lamination and EU L-21
Parameter: Volatile Organic Compounds
Limit: Less than 25 tons per twelve (12) consecutive month period, for each facility

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month (tons of VOC)		Previous 11 Months (tons of VOC)		12 Month Total (tons of VOC)	
	Lamination	L-21	Lamination	L-21	Lamination	L-21

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Monthly Report

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange Indiana 46761
Part 70 Permit No.: T 087-7661-00019
Facility: EU L-10, EU L-21 and EU SB-1
Parameter: Volatile Organic Compounds
Limit: Less than 15 pounds per day, for each facility, coating metal substrates

Month: _____ Year: _____

Day	EU L-10 (pounds of VOC)	EU L-21 (pounds of VOC)	EU SB-1 (pounds of VOC)	Day	EU L-10 (pounds of VOC)	EU L-21 (pounds of VOC)	EU SB-1 (pounds of VOC)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange, Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange, Indiana 46761
Part 70 Permit No.: T 087-j7661-00019

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of Each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Jayco, Inc.
Source Location: 1200 North Detroit, LaGrange, Indiana 46761
County: LaGrange
SIC Code: 3792
Operation Permit No.: T 087-7661-00019
Permit Reviewer: Frank P. Castelli

On October 30, 1998, the Office of Air Management (OAM) had a notice published in the LaGrange Standard, LaGrange, Indiana, stating that Jayco, Inc. had applied for a Part 70 Operating Permit to operate a recreational vehicle manufacturing source with dry filters and a baghouse dust collector for PM control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On November 20, 1998, David Kriegel of Jayco, Inc., submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

Permit

For each proposed revision in the red-lined draft Permit, Jayco, Inc ("Jayco") objects to the Permit term as written and requests that its proposed changes be made. The rationale for such changes are set forth below. For those changes that are corrections of clerical type errors or are obvious on their face, a rationale may not be included.

Please note that the rationale set forth below refers to the conditions as originally numbered in the Draft Permit.

Comment 1:

Section A - Source Summary

Similarly to the descriptive information in Section A.2, Conditions D.1, D.2, and D.3 provide descriptive information on the emission units and do not constitute enforceable conditions. Accordingly, Jayco proposes that the introductory paragraph be revised as noted.

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3, and in conditions D.1 through D.3, is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

Response 1:

The facility description boxes in each D Section have been revised to clarify that descriptive information is not federally enforceable as follows:

Facility Description [326 IAC 2-7-5(15)]:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 2:

Condition A.2 - Emission Units and Pollution Control Equipment Summary

Jayco proposes to revise subsection (c) to reflect that the capacity of the woodworking operation is two (2) tons per hour.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

- (c) One (1) woodworking operation, known as EU W-1, equipped with a cyclone for PM control, installed in 1995, including saws, routers and milling equipment, exhausted through Stack P32-K, capacity: ~~420 pounds of wood~~ two (2) tons per hour.

Response 2:

Condition A.2 and D.2 have been changed as follows:

- (c) One (1) woodworking operation, known as EU W-1, equipped with a cyclone for PM control, installed in 1995, including saws, routers and milling equipment, exhausted through Stack P32-K, capacity: ~~420 pounds~~ **two (2.0) tons** of wood per hour.

In addition, Condition D.2.1 has been revised to reflect the correction of the process weight rate in the original application and the allowable PM emission rate to 6.52 pounds per hour as follows:

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the wood-working facilities shall not exceed **6.52** ~~0.623~~ pounds per hour when operating at a process weight rate of **2.0 tons** ~~420 pounds~~ per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The actual PM emissions after controls of 0.107 pounds per hour is less than the allowable PM emission rate of 6.52 pounds per hour, so therefore the woodworking operation is in compliance with 326 IAC 6-3-2.

Comment 3:

Condition A.3 - Specifically Regulated Insignificant Activities

Jayco proposes that the reference to "G34" be deleted. It appears to be a clerical error.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]~~G34~~

Response 3:

This condition has been corrected as indicated:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]~~G34~~

Comment 4:

Section B

Condition B.4 - Enforceability

Jayco objects to the reference to "citizens under the Clean Air Act" in subsection (b). Citizens rights to enforce Title V permits are governed by the Clean Air Act Section 304, and the courts' interpretations of those rights. There is no obligation to include language in the Title V permit regarding citizens rights under the Clean Air Act nor is there any benefit. Accordingly, Jayco proposes that the condition be revised as noted.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) ~~and citizens under the Clean Air Act.~~

Response 4:

In order to clarify citizens rights under the Clean Air Act, IDEM will make the following change in Condition B.4. This change will be incorporated into individual permits upon request by the Permittee.

B.4 Enforceability [326 IAC 2-7-7(a)]

(b) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens **in accordance with** ~~under~~ the Clean Air Act.

Comment 5:

Condition B.8 - Duty to Supplement and Provide Information

Jayco objects to this condition. Jayco must be allowed a reasonable time to comply with requests for records. Jayco proposes to revise the language of subsection (c) as noted to prevent the condition from becoming unduly burdensome to Jayco.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (c) ~~Upon request~~ As provided herein, the Permittee shall ~~also~~ furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

Response 5:

Condition B.8 (Duty to Supplement and Provide Information) language has been added to clarify what types of documents must be certified by the responsible official. B.8(c) has been revised as follows to clarify the procedures for a claim of confidentiality.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. **The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. ~~If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17~~ **may include a claim of confidentiality in accordance with 326 IAC 17.** If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, ~~then the Permittee must furnish record directly to the U. S. EPA. and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with~~ **may assert** a claim of confidentiality ~~under in accordance with~~ 40 CFR 2, Subpart B.

Comment 6:

Condition B.9 - Compliance with Permit Conditions

Jayco objects to this condition. As written, it is legally inaccurate. For example, a violation of a state-only permit provision is not a violation of the federal Clean Air Act. State-only provisions are only

enforceable at the state level. Therefore, the language of the condition should be changed as noted to more accurately reflect the law.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) ~~The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes~~ may constitute a violation of the Clean Air Act and may be grounds for:

Response 6:

IDEM is aware that noncompliance with conditions that are not federally enforceable may not constitute a violation of the Clean Air Act. Therefore, IDEM will make the following model change to subsection (a) of Condition B.9.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, **except those specifically designated as not federally enforceable**, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.

Comment 7:

Condition B.10 - Certification

Jayco objects to this condition's requirement regarding certification. It is over broad and unduly burdensome. Not all documents listed in this provision are required by law to be certified. Therefore, the language should be changed as noted to clarify that only those documents specifically designated by the permit or specifically required by an applicable requirement must be certified by a responsible official.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) ~~Any application form, report, or compliance certification~~ Where specifically designated by this permit or specifically required by an applicable requirement, any application forms, reports, or compliance certifications submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit~~, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Response 7:

The specific permit conditions requiring submittal of documents will note when the responsible official's certification is required. Changes were made as follows:

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) **Where specifically designated by this permit or required by an applicable requirement, any** ~~Any~~ application forms, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on

information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

Comment 8:

Condition B.11 - Annual Compliance Certification

Jayco proposes that the language of subsection (b) be revised as noted to correct an apparent clerical error. In addition, Jayco proposes to add the term "appropriate" before "identification" in subsection (c) to clarify the condition.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified ~~500 S. Union Street, Mishawaka, Indiana 46544~~ mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

Response 8:

The typographical error in part (b) has been corrected as indicated below. :As part of the U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data" The U.S. District Court of Appeals, Washington D.C. ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law.

Therefore the condition has been revised as follows:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified ~~500 S. Union Street, Mishawaka, Indiana 46544~~ mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The **appropriate** identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
 - ~~(5) Any insignificant activity that has been added without a permit revision; and~~
 - (65) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 9:

Condition B.12 - Preventive Maintenance Plan

Jayco objects to the phrase "lack of proper maintenance" in subsection (b). It is unduly vague and likely will lead to future disputes. The obligation under this provision of the regulations is to implement a specific preventive maintenance plan. Therefore, Jayco proposes that subsection (b) be revised as noted to clarify the condition and to avoid an unauthorized and unduly burdensome application of the preventive maintenance plan regulations.

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ failure to implement the plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

Response 9:

This condition has been revised as suggested and is now as follows:

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Preventive Maintenance Plan**

does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) **A copy of the PMP's shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

Comment 10:

Condition B.14 - Permit Shield

Jayco objects to the language of this condition. Jayco supports the express inclusion of the permit shield in this permit, as indicated in subsection (a). However, the permit language needs to implement the permit shield rather than restate the authorizing rule. The language contained in subsection (b)(1) and (b)(2) does not implement the permit shield, and appears to unnecessarily "qualify" the permit shield contained herein. During discussions with the Indiana Manufacturers Association Workgroup regarding the model Part 70 permit, IDEM agreed with these contentions. Accordingly, Jayco proposes to revise the condition as noted.

In addition, Jayco proposes to add the language noted in new subsection (c) to identify those permit conditions that no longer are applicable to Jayco's facilities.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, ~~provided that:~~
- (1) ~~The applicable requirements are included and specifically identified in this permit;~~
or
- (2) ~~The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- (c) The terms and conditions from previously issued permits specifically identified below are not deemed to be applicable requirements.
- (1) CP-087-3429-00019, Operation Condition 4.
- ~~(e)~~(d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- ~~(d)~~(e) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- ~~(e)~~(f) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(f)~~(g) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(g)~~(h) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(h)~~(i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

Response 10:

Condition B.14 (Permit Shield) has been reworded to clarify the intent as follows:

B.14 Permit Shield [326 IAC 2-7-15]

- (a) ~~This condition provides a permit shield as addressed in 326 IAC 2-7-15. Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. **All previously issued operating permits are superceded by this permit.** ~~Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:~~

- (1) ~~The applicable requirements are included and specifically identified in this permit;~~
~~or~~
- (2) ~~The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~

Comment 11:

Condition B.15 - Multiple Exceedances

Jayco proposes the noted revisions to clarify the condition and to make the condition internally consistent.

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any alleged exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an alleged exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

Response 11:

An exceedance of a permit limitation is not alleged, but documented. The inclusion of the word "alleged" to modify exceedance is not necessary and therefore, no change to the permit is necessary.

Comment 12:

Condition B.16 - Deviations from Permit Requirements and Conditions

Jayco objects to the language of this condition. The term "deviation" has never been defined by IDEM. The proposed definition of this term as set forth in B.16 is confusing. Further, it imposes a significant burden - i.e., a report within ten (10) days, for an event that may be no more than an ink pen running out on a continuous data recorder. For the event reported to match the speed with which the report is to be made, Jayco proposes the noted revisions.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit ~~requirements~~ emission limitations (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and ~~any~~ appropriate response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit emission limitation ~~or a failure to comply with a requirement of the permit or a rule~~. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit ~~unless tied to an applicable rule or limit~~; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4)(3) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter .~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

Response 12:

Condition B.16 (Deviations from Permit Requirements and Conditions) paragraphs (a) & (b) have been revised so that Condition B.16 will not conflict with C.15 (Compliance Monitoring Plan - Failure to Take Response Steps). This should clarify that failure to perform or record the required monitoring is a deviation, but if the failure is less than 5% per quarter then it doesn't have to be reported as a deviation. Then Condition C.15(f) allows IDEM the discretion to not enforce against the failure to perform or record provided they justify the reasons for the failure.

The revised condition is as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation. **The failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or

- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
- ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Comment 13:

Condition B.18 - Permit Renewal

Jayco proposes to revise the language as noted to correct a clerical error.

B.18 Permit Renewal [326 IAC 2-7-4]

- (B) If the date postmarked on the envelope or certified ~~500 S. Union Street, Mishawaka, Indiana 46544~~ mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

Response 13:

The clerical error has been corrected and language has been added to clarify that an application to renew the permit must be certified by the responsible official.

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). **The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

Comment 14:

Condition B.24 - Inspection and Entry

Jayco objects to this condition. The Indiana Manufacturer's Association Workgroup and IDEM agreed in discussions regarding the model Part 70 permit to clarify that entry and access to the Permittee's premises and documents remains subject to the Permittee's right to claim confidentiality. Therefore, Jayco proposes to revise the language as noted.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the permittee's right to claim that information collected by the agency is confidential and must be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

Response 14:

Condition B.24 (now B.23) has been revised as suggested to clarify the permittee's rights and obligations to claim confidentiality under applicable law. The condition now reads:

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such**, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

Comment 15:

Condition B.28 - Credible Evidence

Jayco objects to and proposes to delete the "credible evidence" condition. The condition itself is unduly vague, ambiguous, and confusing. As drafted, "credible evidence" has no definitive boundaries, and it should not be used as a compliance condition. IDEM has no authority to include such condition in this permit. The applicable law spells out how compliance is to be determined and violations are to be established. Each individual source has specific methods and tests contained in its permit that ensure compliance with the applicable emission limitations. For these reasons, the credible evidence condition should be deleted.

Response 15:

The IDEM now believes that Condition B.28 is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under this authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~**B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]**~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

Comment 16:

Section C

Condition C.6 - Operation of Equipment

Jayco proposes to revise the condition as noted to prevent conflict between this condition and other conditions contained in the Permit.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation, except as otherwise provided.

Response 16:

It has been determined that while some emission units will require control devices, it is possible that some of the processes for an emission unit may not require the use of the control device to maintain compliance with emission limitations. Therefore, new language will be added to Condition C.6 in order to include a provision for these exceptions.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, All all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Comment 17:

Condition C.9 - Compliance Schedule

Jayco proposes the noted changes to more accurately reflect the cited provision.

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with ~~such~~ all applicable requirements; and
- (c) Will ~~comply with such~~ meet on a timely basis applicable requirements that become effective during the term of this permit.

Response 17:

Condition C.9(Compliance Schedule) was removed from the Title V model permit because it is an application requirement, not a permit requirement. 6. A new Condition C.9 (Compliance Requirements) has been added and refers to IDEM's general compliance authority in 326 IAC 2-1.1-11.

~~C.9 Compliance Schedule [326 IAC 2-7-6(3)]~~

~~The Permittee:~~

- ~~(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and~~
- ~~(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and~~

~~(c) Will comply with such applicable requirements that become effective during the term of this permit.~~

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Comment 18:

Condition C.10 - Compliance Monitoring

Jayco objects to this condition's requirement that "[c]ompliance with applicable requirements shall be documented as required by this permit." It is duplicative and unnecessary and could result in multiple violations occurring from a single act or omission. Accordingly, Jayco proposes the noted revisions.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

~~Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:~~

Response 18:

Condition C.10 (Compliance Monitoring) has been revised as suggested and to clarify that new emission units must begin compliance monitoring upon start-up. Existing units should continue any already required compliance monitoring, but have 90 days to start any CM that has been added as a result of TV review.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

~~Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:~~

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

Comment 19:

Condition C.11 - Maintenance of Monitoring Equipment

Jayco objects to this condition. It is confusing and has no specific relevance to Jayco's operation. In addition, Jayco objects to this condition because it goes beyond the authority granted under the referenced citations. Furthermore, to the extent that regulatory authority exists, the condition's requirements would be more appropriately addressed elsewhere in the permit, such as in the required preventative maintenance plans. For these reasons, Jayco proposes to delete this condition.

~~C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~

- ~~(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.~~
- ~~(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

Response 19:

Condition C.11 has been deleted as suggested because there are no requirements for monitoring equipment associated with any of the emission units. All subsequent Section C conditions have been renumbered.

Comment 20:

Condition C.14 - Risk Management Plan

Jayco objects to subsection (b) of this condition, as no authority exists to require such certification of proper implementation. Jayco also objects to the certification requirement being restated in this condition. It is duplicative and unnecessary and could result in multiple violations for a single act or omission. Accordingly, the condition should be revised as noted.

~~C.14~~13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- ~~(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.~~

~~All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Response 20:

Condition C.14 (now C.13) (Risk Management Plan) (b) was removed because it is repetitive of (a)(2) (now (b)). They both required the same thing, and the source does not need to separately certify RMP compliance. Condition C.14 has been changed as follows:

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall **submit**:

- ~~(a) Submit:~~
- ~~(a1)~~ A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - ~~(b2)~~ As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - ~~(c3)~~ A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- ~~(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.~~

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 21:

Condition C.15 - Compliance Monitoring Plan Failure to Take Response Steps

Jayco objects to this condition. First, the language in this section is duplicative of language contained in Section D, which spells out clearly the compliance monitoring requirements. Restating those requirements here is duplicative and unnecessary and could result in multiple violations from

a single act or omission. Furthermore, the language of this section goes beyond IDEM's authority in the referenced citations. The specified response requirements of a Compliance Response Plan are not reasonably ascertainable from the Rule. Therefore, Jayco proposes that the condition be changed as noted.

C.4514 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

-
- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) ~~This condition;~~
 - (2) ~~The Compliance Determination Requirements in Section D of this permit;~~
 - (3) ~~(1) The Compliance Monitoring Requirements in Section D of this permit; and~~
 - (4) ~~(2) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
 - (5) ~~A Compliance Response Plan (GRP) for each compliance monitoring condition of this permit. GRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The GRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:~~
 - (A) ~~Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~
 - (B) ~~A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- (b) ~~For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~
- (c) ~~(b)~~ After Upon investigating ~~the reason for the~~ a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

- (3) An automatic measurement was taken when the process was not operating; or
- (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

Response 21:

Condition C.15 (now C.14) has been revised as follows to clarify the intent:

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] ~~[326 IAC 1-6]~~

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. **The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the** This compliance monitoring plan ~~is comprised of~~ **are:**
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) **Reasonable** response steps that ~~may will~~ be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking **reasonable** ~~such~~ response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, ~~appropriate~~ **reasonable** response steps shall be taken when indicated by the provisions of that compliance monitoring condition. ~~Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan to take reasonable response steps shall constitute a violation of the permit. unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~
- (c) ~~After investigating the reason for the excursion,~~ **Upon investigation of a compliance monitoring excursion,** the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) ~~The monitoring equipment malfunctioned, giving a false reading.~~ **A false reading occurs due to the malfunction of the monitoring equipment.** This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned **or is returning** to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) **All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.**
- (f) **If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.**
 - (1) **At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.**
 - (2) **Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.**

Comment 22:

Condition C.16 - Actions Related to Noncompliance Demonstrated by a Stack Test
Jayco objects to this condition and proposes that it be deleted. Jayco understands that one of the

goals of the part 70 permit program is to enhance compliance at the plant. To that end, it would help Jayco to comply if irrelevant provisions, such as this one, are deleted from the permit. Their existence is confusing and unnecessary.

~~C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]~~

- ~~(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~
- ~~(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~

~~The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Response 22:

Condition C.16 (now C.15) (Actions Related to Noncompliance Demonstrated by a Stack Test) has been revised as follows:

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize **excess** emissions from the affected facility while the corrective actions are being implemented. ~~IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~
- (c) **IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.**

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 23:

Condition C.18 - Monitoring Data Availability

Jayco objects to this condition. As with Condition C.15, the language of subsections (a), (b) and (c) of this paragraph go beyond the authority of the referenced citations. In addition, language in subsections (b) and (c) is unduly vague, as in the reference to "abnormal conditions." Furthermore, subsection (c) contains a general statement that appears to add requirements without authority. Accordingly, subsections (a), (b) and (c) should be deleted.

C.4816 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- ~~(a)~~ With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- ~~(b)~~ As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- ~~(c)~~ If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- ~~(d)~~(a) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, as required by Section D's Compliance Monitoring and Record keeping and Reporting Requirements, reasons for this must be recorded.
- ~~(e)~~(b) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- ~~(f)~~(c) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

Response 23:

Condition C.18 (Monitoring Data Availability) has been incorporated into Condition C.14 Compliance Monitoring Plan- Failure to Take Response Steps. The rest of Section C has been re-numbered to account for the deletion of Condition C.18.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- ~~(a)~~ With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- ~~(b)~~ As an alternative to the observations, sampling, maintenance procedures, and record

~~keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~

- ~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~
- ~~(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~
- ~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~
- ~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

Comment 24:

Condition C.19 - General Record Keeping Requirements

Jayco objects to this condition. The requirement that the facility produce required records "upon request" may be unreasonable and unduly burdensome. Therefore, Jayco proposes that the language be changed as noted to provide that records be produced within a reasonable time. This change is consistent with the terms IDEM agreed to with the IMA/Chamber work group.

In addition, subsection (c)(4) should be deleted. It imposes an all-encompassing additional requirement to maintain records of all preventive maintenance regardless of whether the substantive permit conditions even require that such records be maintained. To the extent that records of preventive maintenance are required, they are addressed elsewhere in the permit.

C.4917 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available within a reasonable time upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available within a reasonable time upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and

- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation required by Section D;
 - (3) All calibration and maintenance records required by Section D;
 - ~~(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Response 24:

Condition C.19 (now re-numbered C.17) (General Record Keeping Requirements) has been revised to be more consistent with the rules and to assure sources that they get a "reasonable time" to produce records.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request of an IDEM, OAM, representative.~~ The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance. ~~shall be sufficient to demonstrate that did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

Comment 25:

Condition C.20 - General Reporting Requirement
Jayco proposes to revise the language as noted to correct a clerical error.

C.2018 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified ~~500 S. Union Street, Mishawaka, Indiana 46544~~ mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

Response 25:

Condition C.20(c) (now C.18(c)) has had the clerical error corrected as shown below: In addition C.20(d) (now C.18(d)) has been revised so that it is clear the reports it refers to are the ones required by Section D. Condition C.20(g) (now C.18(g)) has been revised to clarify that IDEM bases quarters and semi-annual reports on calendar year not on when the permit is issued. For example if a source is issued a permit in February, they need to submit their first quarterly report in March.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified ~~500 S. Union Street, Mishawaka, Indiana 46544~~ **mail** receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly **or semi-annual** report **required in Section D of this permit** shall be submitted within thirty (30) days of the end of the reporting period. **The reports do not require the certification by the "responsible official" as**

defined by 326 IAC 2-7-1(34).

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**

Comment 26:

Section D

Condition D.1 - Facility Description

Jayco objects to references to capacity in this condition. This term is not required by any rule or regulation. And, the capacity description is not necessary here to identify the emission units. Further, this information is based on data and calculations that could be revised over time based on more accurate data or a better understanding of how to calculate the capacity. For all of these reasons, capacity should be addressed in the TSD. Therefore, Jayco proposes the noted revisions.

Facility Description [326 IAC 2-7-5(15)]

- (a) ne (1) custom spray booth, known as EU SB-1, installed in 1995, equipped with air-assisted airless and air atomization spray applicators, equipped with dry filters for PM control, exhausted through Stack P35-A, ~~maximum capacity to support the assembly lines.~~
- (b) One (1) lamination operation, known as EU Lamination, installed in 1995, exhausted in the building interior, ~~maximum capacity to support the assembly lines.~~
- (d) One (1) recreational vehicle assembly line, known as EU L-10, installed in 1993, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations; ~~capacity: 4 RVs per hour.~~
- (e) One (1) recreation vehicle assembly line, known as EU L-21, installed in 1992, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations; ~~capacity: 4 RVs per hour.~~

Response 26:

The application forms for the Part 70 permit requested the "maximum number of production units per hour." This production capacity is the basis for determining applicability with the rules that establish emission limitations, permitting requirements and other requirements reflected in this permit. Although the capacity of the emission units is not an enforceable limit, any change in equipment including increased capacities may trigger new requirements or require prior approval from IDEM, OAM. In order to identify addition equipment or modification of existing equipment, the equipment list must specify the quantity of a given type of equipment and their capacities.

Although, Jayco has requested that the capacity be deleted from all emission units, this is IDEM's tracking mechanism to determine if in fact there has or has not been such a change.

Comment 27:

Condition D.1.1 - Volatile Organic Compounds

Jayco objects to this condition. Jayco proposes to delete subsection (b), as EU L-21 is subject to 326 IAC 8-2-9, and not 326 IAC 8-1-6. In addition, Jayco proposes to revise subsection (c) to clarify that the condition applies to EU Lamination only, and to more accurately reflect the applicable rule's limitation on emissions rather than usage. Such language more accurately reflects the limits provided in CP087-3429-00019, which IDEM references as authority for this condition.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to CP 087-3429-00019, issued on January 17, 1995, the VOC delivered to the applicators of the lamination booth EU Lamination shall be limited to twenty four (24) tons per twelve (12) consecutive month period.
- ~~(b) The VOC emissions delivered to the applicators of the assembly line EU L-21 shall be limited to twenty four (24) tons per twelve (12) consecutive month period.~~
- ~~(c)~~(b) Any change or modification ~~which may increase actual VOC usage to~~ at EU Lamination which results in actual VOC emissions exceeding twenty-five (25) tons per year or more from the facilities such facility listed in (a) and/or (b) above, will make ~~the~~ that facility subject to 326 IAC 8-1-6.

Response 27:

The NOD response dated September 9, 1998 from David Kriegel to Paul Dubenetzky specifically requested on page 3 that a 24 ton per year VOC limit be imposed on L-21 to avoid the requirements of 326 IAC 8-1-6. Since both metal and plastics are coated in this booth, and the source has opted not to be subject 326 IAC 8-2-9 as stated in Condition D.1.2(a), and since no other Article 8 rule applies to the coating operation, 326 IAC 8-1-6 is applicable. Since the source has agreed to this 24 ton limit to avoid the applicability of 326 IAC 8-1-6, Condition D.1.1(b) has been retained. Condition D.1.1 has been revised as follows to limit VOC emissions to less than 25 tons per year.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to CP 087-3429-00019, issued on January 17, 1995, the VOC delivered to the applicators of the lamination booth EU Lamination shall be limited to ~~twenty four (24)~~ **less than twenty five (25)** tons per twelve (12) consecutive month period.
- (b) The VOC emissions delivered to the applicators of the assembly line EU L-21 shall be limited to ~~twenty four (24)~~ **less than twenty five (25)** tons per twelve (12) consecutive month period.

Since the limit for EU L-21 has not been eliminated, part (c) of this condition is retained to reference both emission units.

Comment 28:

Condition D.1.2 - Volatile Organic Compounds

Jayco objects to this condition and proposes to revise the language as noted to more accurately reflect the limits provided in the rule.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) The two (2) assembly lines, EU L-10 and EU L-21, shall be limited to ~~fourteen (14) pounds~~ less than fifteen (15) pounds per day of VOC each, including coatings, dilution solvents, and cleaning solvents, when coating metal substrates. This usage limit makes 326 IAC 8-2-9 not applicable.
- (b) Any change or modification which may increase actual VOC usage when coating metal substrates to fifteen (15) pounds per day or more from these two (2) assembly lines, EU L-10 and EU L-21, will make ~~the~~ such facilities subject to 326 IAC 8-2-9.
- (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coatings delivered to the applicators at EU SB-1 when coating metal shall be limited to three and a half (3.5) pounds of VOC per gallon of coating less water on a daily volumetrically weighted basis on all days when total VOC emissions from this spray booth exceed fifteen (15.0) pounds, for forced warm air or air dried coatings.
- However, pursuant to CP 087-3429-0019, issued on January 17, 1995, so long as the customized top coating of automobiles and trucks at custom spray booth EU SB-1 remains less than thirty-five (35) vehicles per day, the requirements of 326 IAC 8-2-9 are not applicable to the surface coating of metal parts and products at EU SB-1.
- (d) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Response 28:

The fourteen (14) pound per day limit has been changed to less than 15 pounds per day as shown below.

IDEM has decided that the thirty-five (35) vehicle per day limitation is not applicable to RVs, such as those produced at this source. The thirty-five (35) vehicle per day exclusion to 326 IAC 8-2-9 applies to customized top coating of automobiles and trucks, not RVs.

The wording of part (a) of this condition has been revised as suggested as follows:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) The two (2) assembly lines, EU L-10 and EU L-21, shall be limited to ~~fourteen (14) pounds~~ **less than 15 pounds** per day of VOC **each**, including coatings, dilution solvents, and cleaning solvents, when coating metal substrates. This usage limit makes 326 IAC 8-2-9 not applicable.

Comment 29:

Condition D.1.3 - VOC Usage Limitations

Jayco objects to this condition. It is inconsistent with the terms of CP 087-3429-00019. Jayco proposes to revise the language of Condition D.1.3 to reflect that EU SB-1 is exempt from 326 IAC 8-2-9, so long as its customized top coating of automobiles and trucks remains less than thirty-five vehicles per day. The language should read: "Pursuant to CP 087-3429-00019, issued on January 17, 1995, so long as the customized top coating of automobiles and trucks at custom spray booth EU SB-1 remains less than thirty-five (35) vehicles per day, the requirements of 326 IAC 8-2-9 are not applicable to the surface coating of metal parts and products at EU SB-1." Such exemption is

contained in CP087-3429-00019, which remains applicable to this facility. For additional support, see the comments to the Technical Support Document contained herein.

D.1.3 VOC Usage Limitation [326 IAC 8-2-9]

~~Pursuant to CP 087-3429-00019, issued on January 17, 1995, the input VOC usage in the custom spray booth, known as EU SB-1 shall be limited to less than fifteen (15) pounds per day and any change or modification which increases the VOC usage per day to fifteen (15) pounds or greater shall obtain a New Construction Permit before any such change may occur. Therefore, 326 IAC 8-2-9 does not apply.~~

Response 29:

This condition has been revised to correct the statement that it is not pursuant to CP 087-3429-00019. As stated in Response 28, IDEM has decided that the thirty-five (35) vehicle per day exclusion to 326 IAC 8-2-9 is not applicable to RVs, such as those produced at this source. Therefore, Condition D.1.3 has been retained.

D.1.3 VOC Usage Limitation [326 IAC 8-2-9]

~~Pursuant to CP 087-3429-00019, issued on January 17, 1995, The input VOC usage in the custom spray booth, known as EU SB-1 shall be limited to less than fifteen (15) pounds per day and any change or modification which increases the VOC usage per day to fifteen (15) pounds or greater shall obtain a New Construction Permit before any such change may occur. Therefore, 326 IAC 8-2-9 does not apply.~~

In addition part (c) of Condition D.1.11 (now D.1.10) has been deleted to remove the vehicle limitation requirement as shown below:

D.1.11 Record Keeping Requirements

~~(c) — To document compliance with Condition D.1.3, the Permittee shall maintain a log of the number of vehicles coated in the custom spray booth (EU SB-1) per day.~~

Comment 30:

Condition D.1.4 - Particulate Matter

Jayco proposes to add the language “for one-hundred (100) pounds per hour” prior to “up to sixty thousand (60,000)” to clarify the meaning of the rule. As currently drafted, it appears to conflict with the language of Condition C.1. Consequently, it could lead to confusion among those employees charged with implementing the permit.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the assembly lines, EU L-10 and EU L-21, as well as the custom spray booth, EU SB-1, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate for one-hundred (100) pounds per hour up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Response 30:

Condition D.1.4 has been revised as shown below:

Pursuant to 326 IAC 6-3-2, The PM from the assembly lines, EU L-10 and EU L-21, as well as the custom spray booth, EU SB-1, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate **for one hundred (100) pounds per hour** up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Comment 31:

Condition D.1.5 - Preventive Maintenance Plan

Jayco objects to and proposes to delete this condition as the dry filters are not required for compliance. See comments to Condition D.1.10 for additional support.

~~D.1.5 - Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.~~

Response 31:

Pursuant to 326 IAC 1-6-3 (Preventive maintenance plans) any person responsible for operating any facilities specified in 326 IAC 1-6-1 shall prepare and maintain a Preventive maintenance plan. Facilities specified in 326 IAC 1-6-1 include all facilities to obtain a permit pursuant to 326 IAC 2-1-2, including those that do not have any control devices. Therefore, this condition cannot be deleted.

Comment 32:

Condition D.1.6 - Compliance Determination Requirements

Jayco objects to this condition. The terms of this provision go beyond IDEM's authority. Accordingly, Jayco proposes that the last two sentences of Condition D.1.6 be deleted.

~~D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Response 32:

Condition D.1.6 has been deleted as follows:

~~D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C—Performance Testing.~~

Comment 33:

Condition D.1.7 - Compliance Determination Requirements

Jayco objects to this condition. Jayco proposes to delete the term “usage.” The limits provided in D.1.1 apply to VOC, not to product usage. Therefore, the “usage” language may cause unnecessary confusion. Also, Jayco proposes to delete the last sentence of Condition D.1.7. Inclusion of such language in this permit exceeds the authority granted to IDEM under the applicable regulations.

D.1.7 Volatile Organic Compounds (VOC)

~~Compliance with the VOC usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

Response 33:

Condition D.1.7 (now D.1.6) has been changed to recognize that both VOC usage and/or content limitations are cited in Conditions D.1.1 and D.1.2. The reservation of the authority requiring the use of Method 24 to verify VOC content is appropriate and is therefore retained. The condition is changed as follows:

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC **content and** usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Comment 34:

Condition D.1.8 - Compliance Determination Requirements

Jayco proposes to revise the language in subsection (a) as noted to reflect that Condition D.1.1. only applies to EU Lamination. Jayco also proposes to add subsection (c) to provide for a demonstration of compliance with the thirty-five vehicle limitation applicable to EU SB-1.

D.1.8 VOC Emissions

- (a) Compliance with Condition D.1.1 shall be demonstrated at the end of each month for ~~EU L-21 and~~ EU Lamination based on the total volatile organic compound usage for the most recent 12 months.
- (b) Compliance with Condition D.1.2(a) shall be demonstrated at the end of each day for EU L-10 and EU L-21, based on the total volatile organic compound usage for the most recent day

when coating metal substrates.

- (c) Compliance with Condition 1.5 shall be demonstrated at the end of each day of operation based on the total number of vehicles through the XXXXXXXX spray booth, EU-SB-XXX.

Response 34:

Since D.1.1(b) has not been revised to remove EU L-21 this condition does not need to be revised. See Responses 28 and 29.

Comment 35:

Condition D.1.10 - Compliance Monitoring Requirements

Jayco objects to and proposes to delete this condition. Jayco does not need control devices to remain in compliance. The process weight rule is the only applicable requirement that could require the use of a control device to achieve compliance. The maximum process weight rate for the custom trim paint booth is estimated to be 22.2 tons per hour (11,108 lbs per vehicle times 4 vehicles per hour). The allowable emission rate, based on the following formula, would amount to 32.8 lbs/hr.

$$E = 4.1(22.2)^{0.67} = 32.8 \text{ lbs/hour}$$

The uncontrolled emission rate of particulate matter can be calculated based on the use of 1.25 gallons of coating per vehicle, a coating density of 7.0 lbs/gallon containing 50 percent solids by weight and a coating transfer efficiency of 50 percent. This represents the highest usage per vehicle and the coating with the highest anticipated solids content. The resulting uncontrolled particulate emission rate is 8.75 lbs/hr. as determined by the following calculation:

$$1.25 \frac{\text{gallons}}{\text{vehicles}} \times 4 \frac{\text{vehicles}}{\text{hr.}} \times 7.0 \frac{\text{lbs}}{\text{gallon}} \times \frac{0.50 \text{ lbs solids}}{\text{lb coating}} \times 0.5 = 8.75 \text{ lbs/hr.}$$

Since the maximum uncontrolled rate is much less than the allowable rate, the filters are not required to comply with the process weight limit. Therefore, the monitoring provided in this condition is unduly burdensome and unnecessary.

~~D.1.10 Monitoring~~

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating spray booth Stack P35-A, when spraying operations in the custom spray booth, known as EU-SB-1 are being performed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- ~~(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Response 35:

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. Condition D.1.10 (now D.1.9) has been revised as follows:

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating spray booth Stack P35-A, when spraying operations in the custom spray booth, known as EU SB-1 are being performed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

In addition Condition part (d) of Condition D.1.11 (now D.1.10) has been revised as follows to reflect the change in the compliance monitoring requirements for the filters.

D.1.11 Record Keeping Requirements

- (d) To document compliance with Conditions D.1.4, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 36:

Condition D.1.11 - Record Keeping Requirements

As a general rule, record keeping and reporting requirements should be consistent with the other terms of the permit. To that end, Jayco proposes to revise the language as noted to reflect the proposed changes above. Jayco also proposes to work with IDEM to ensure that record keeping remains consistent with other terms and conditions of the permit.

In addition, Jayco objects to and proposes to delete subsection (e), as it is duplicative and unnecessary.

Jayco also wants IDEM to understand that it intends to comply with the record keeping requirements by demonstrating daily usage by use of a mass balance calculation.

D.1.11 Record Keeping Requirements

- (a) To document compliance of EU Lamination with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly for EU Lamination and EU L-21 shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~ Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use operation;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - ~~(5) The weight of VOCs emitted for each compliance period.~~
- (b) To document compliance with Condition D.1.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily for EU L-10 and EU L-21 shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day;
 - (4) The total VOC usage for each day; and
 - (5) The weight of VOCs emitted for each compliance period.
- ~~(c) To document compliance with Condition D.1.3, the Permittee shall maintain a log of the~~

~~number of vehicles coated in the custom spray booth (EU SB-1) per day.~~

- (d) To document compliance with Conditions D.1.4, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

Response 36:

Condition D.1.11 (now D.1.10) has not been revised because it is reasonable to require that records shall include purchase orders, invoices, and material safety data sheets (MSDS). Also since the VOC limits contained in Condition D.1.1 are weight limits the condition to keep records of the weight of VOCs emitted for each compliance period is also necessary. Part (e) of Condition D.1.11 is required to cite the general record keeping requirements of Section C.

Comment 37:

Condition D.2 - Facility Description

Jayco objects to references to capacity in this condition. This term is not required by any rule or regulation. And, the capacity description is not necessary here to identify the emission units. Further, this information is based on data and calculations that could be revised over time based on more accurate data or a better understanding of how to calculate the capacity. For all of these reasons, capacity should be addressed in the TSD. Therefore, Jayco proposes the noted revisions.

Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) woodworking operation, known as EU W-1, equipped with a cyclone for PM control, installed in 1995, including saws, routers and milling equipment, exhausted through Stack P32-K, capacity: 120 pounds of wood per hour.

Response 37:

See Response 26.

Comment 38:

Condition D.2.1 - Particulate Matter (PM)

Jayco objects to this condition. The allowable PM emission rate is to be calculated using the equation $E = 4.10P^{0.67}$ where E equals the allowable PM emission rate in pounds per hour and P equals the process weight rate in tons per hour. The condition, as written, appears to set maximum values for the variable P and the allowable emission rate. Therefore, Jayco proposes the noted revisions.

Jayco also proposes to add the language "for one-hundred (100) pounds per hour" prior to "up to sixty thousand (60,000)" to clarify the meaning of the rule. As currently drafted, it appears to conflict with the language of Condition C.1. Consequently, it could lead to confusion among those employees charged with implementing the permit.

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

~~Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the wood-~~

~~working facilities shall not exceed 0.623 pounds per hour when operating at a process weight rate of 120 pounds per hour.~~

~~The pounds per hour limitation was calculated with the following equation:~~

Pursuant to 326 IAC 6-3 (Process Operations), the PM from the woodworking facilities shall not exceed the pound per hour emission rate established as E in the following formula.

Interpolation and extrapolation of the data for the process weight rate for one hundred (100) pounds per hour up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Response 38:

The process rate for the woodworking operation was not stated as being variable and in fact has been revised in these comments to a maximum of 2.0 tons per hour. The condition has been revised as shown below to correct the error in the process weight rate in the application.

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the wood-working facilities shall not exceed **6.52** ~~0.623~~ pounds per hour when operating at a process weight rate of **2.0 tons** ~~120 pounds~~ per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate **of one hundred (100) pounds per hour** up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Comment 39:

Condition D.2.2 - Preventive Maintenance Plan

Jayco proposes that the language be changed as noted to clarify that the PMP is required only for the cyclone.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this facility and its control device~~ the Cyclone.

Response 39:

The condition has been revised as shown below:

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this **woodworking operation and its cyclone**.

Comment 40:

Condition D.2.3 - Compliance Determination Requirements

Jayco proposes to delete the last two sentences of Condition D.2.3 as they exceed IDEM's authority, and are unnecessary.

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Response 40:

Condition D.2.3 has been deleted as follows:

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Comment 41:

Condition D.2.5 - Compliance Monitoring Requirements

Jayco objects to, and proposes to delete this condition. Jayco believes that there are no compliance monitoring requirements applicable to this facility. Indiana only requires compliance monitoring plans for units which (1) emit PM, sulfur dioxide, or VOCs; and (2) are subject to a NSPS or NESHAP; or the unit has a device to control emissions and allowable emissions exceed 10 lbs/hr. See IDEM CAM Guidance, p. 11. The allowable PM emission rate is only 6.5 pounds per hour at a process weight rate of 2 tons per hour capacity, well below the ten pound threshold.

D.2.5 Visible Emissions Notations

- ~~(a) Daily visible emission notations of the cyclone stack exhaust (Stack P32-K) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

- ~~(c) — In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) — A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) — The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

Response 41:

The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. It has not been demonstrated sufficiently that the dust collectors and cyclones are not needed for the woodworking operations to stay in compliance. Therefore, the visible emission observations and control device inspections are required for the woodworking operations. Note that visible emission notations and quarterly inspections are only required when emissions are vented to the outside atmosphere.

Comment 42:

Condition D.2.6 - Record Keeping Requirements

As a general rule, record keeping and reporting requirements should be consistent with the other terms of the permit. To that end, Jayco proposes to delete condition (a) and to work with IDEM to ensure that all record keeping remains consistent with other terms and conditions of the permit.

Jayco also proposes to delete (b) as it is duplicative and unnecessary.

~~D.2.6 — Record Keeping Requirements~~

- ~~(a) — To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the cyclone stack exhaust.~~
- ~~(b) — All records shall be maintained in accordance with Section C — General Record Keeping Requirements, of this permit.~~

Response 42:

The record keeping of Condition D.2.6 (now D.2.5) is required to show compliance with Condition D.2.5 (D.2.4). Therefore it cannot be deleted.

Comment 43:

Condition D.3.2 - Particulate Matter

Jayco proposes to add the language “for one-hundred (100) pounds per hour” prior to “up to sixty thousand (60,000)” to clarify the meaning of the rule. As currently drafted, it appears to conflict with the language of Condition C.1. Consequently, it could lead to confusion among those employees charged with implementing the permit.

D.3.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility

shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate for one hundred (100) pounds per hour up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Response 43:

The condition has been revised as suggested as shown below:

D.3.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate for **one hundred (100) pounds per hour** up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Comment 44:

Condition D.3.3 - Compliance Determination Requirements

Jayco objects to this condition and proposes that the last two sentences of Condition D.3.3 be deleted. They exceed IDEM's authority, and are unnecessary.

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. ~~However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Response 44:

Condition D.3.3 has been deleted as follows:

~~**D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**~~

~~The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Comment 45:

Forms

All forms should be revised to remain consistent with the Permit conditions as revised herein, and in the accompanying red-lined permit.

Response 45:

The report form for showing compliance with the fourteen (14) pound per day VOC limit for EU SB-1 has been incorporated into the report form for EU L-10 and EU L-21 as shown. In addition, as discussed in Response 28, the vehicle limitation has not been incorporated in the permit and therefore the reporting form has been deleted. A statement has also been added to the Monthly Report, stating that this form does not require a certification. The bottom of this form now say "A certification is not required for this report".

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Monthly Report

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange Indiana 46761
Part 70 Permit No.: T 087-7661-00019
Facility: EU L-10, and EU L-21 and EU SB-1
Parameter: Volatile Organic Compounds
Limit: 14 pounds per day, for each facility, coating metal substrates

Month: _____ Year: _____

Day	EU L-10 (pounds of VOC)	EU L-21 (pounds of VOC)	EU SB-1 (pounds of VOC)	Day	EU L-10 (pounds of VOC)	EU L-21 (pounds of VOC)	EU SB-1 (pounds of VOC)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Monthly Report

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange Indiana 46761
Part 70 Permit No.: T 087-7661-00019
Facility: EU-SB-1
Parameter: Vehicles Produced per Day
Limit: Less than 35

Month: Year:

Day	EU-SB-1 (vehicles produced)	Day	EU-SB-1 (vehicles produced)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by:

Title / Position:

Signature:

Date:

Phone:

Comment 46:

Technical Support Document

General Comment. The TSD should be revised to accommodate those revisions identified in the Permit discussion above and in the accompanying red-lined permit.

Response 46:

The TSD is not physically revised. All permit revisions have been addressed in this Addendum to the Technical Support Document.

Comment 47:

Enforcement Issue. Jayco proposes to include language that reflects the fact that it has requested, and is entitled to, limited liability for EU L-10. Jayco therefore is not subject to enforcement regarding such facility.

Response 47:

The decision on whether or not Jayco is entitled to limited liability will be made by Enforcement.

Comment 48:

Potential Emissions. The reported potential emissions and the calculated potential emissions contained in the TSD were done by the State. It is Jayco's position that the potential emissions calculated by the State may or may not reflect accurately the plant's potential emissions.

Response 48:

The potential emissions calculated by the State utilized the information in the application plus the responses for additional information provided by KERAMIDA on September 14, 1998. Although the potential emissions are based on operating each and every hour of the year (8,760 hours per year), the actual emissions at Jayco may be less.

Comment 49:

State Rule Applicability 326 IAC 8-1-6. Jayco proposes to revise the language to clarify that Jayco will limit VOC emissions from each of the facilities to "less than twenty-five (25) tons per year" to avoid applicability of the rule. Such language more accurately reflects the rule's applicable threshold.

Response 49:

The permit language in Condition D.1.1(a) and (b) has been revised as shown in Response 27.

Comment 50:

State Rule Applicability 326 IAC 8-2-9. Jayco objects to and proposes to revise the language to clarify that VOC emissions for EU L-10 and EU L-21 will be limited to “less than fifteen (15)” pounds per day for each booth. Such language more accurately reflects the rule’s applicable threshold.

In addition, Jayco proposes to delete “EU SB-1” from inclusion in 8-2-9. CP#087-3429-00019, Operation Condition 5, limits the amount of vehicles coated at EU SB-1 to less than 35 per day to avoid the applicability of 326 IAC 8-2-9. That regulation provides an exemption for “customized top coating of automobiles and trucks, if production is less than thirty-five (35) vehicles per day.” 326 IAC 8-2-9. IDEM originally determined that 326 IAC 8-2-9 did not apply to Jayco’s LaGrange operation because the operation met the two required conditions for the exemption: 1) customized top coating, and 2) daily production of less than 35 vehicles. See Technical Support Document for New Construction and Operation, CP#087-3429-00019. Jayco’s LaGrange operation continues to meet those conditions. First, Jayco puts customized top coating on its vehicles (a bottom stripe), which are assembled on truck chassis. Second, Jayco’s daily production remains less than 35 vehicles. For these reasons, IDEM’s original analysis still applies. Nothing has changed that would remove Jayco’s LaGrange operation from the exemption for customized top coating of automobiles and trucks.

Response 50:

See Responses 28 and 29.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

1. Condition B.2 (Definitions) has been revised as follows.

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any the~~ applicable definitions found in **the statutes or regulations** (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

2. Condition B.17 (Permit Modification, Reopening, Revocation and Reissuance, or Termination) it was confusing to have the responsible official certification at the end of the condition, therefore it has been moved to (a). Also the “and” has been changed to “or” in (b)&(c) to clarify that IDEM may reopen a permit as follows:

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] **The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
 - (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
 - (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)] ~~The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
3. Condition B.19 (Permit Amendment or Modification) (a) has been revised because IDEM does not want a source to be liable for both a TV permit violation and a rule violation as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) ~~The Permittee must comply with~~ **Permit amendments and modifications are governed by** the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
4. Condition B.21 (Changes Under Section 502(b)(10) of the Clean Air Act) has been deleted as follows.

~~B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]~~

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

- ~~(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~
 - ~~(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~
5. In Condition B.22 (now B.21) (Operational Flexibility), the rule cite in (a)(2) was changed to reference 326 IAC 2-7-10.5. The outline in Condition B.22(b) has been revised so that it follows the numbering system that is in the rest of the permit. Condition B.22(e) has been deleted as follows:

B.22 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any **preconstruction** approval required by 326 IAC ~~2-4.4~~ **2-7-10.5** has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) ~~For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

- ~~(1) A brief description of the change within the source;~~
- ~~(2) The date on which the change will occur;~~
- ~~(3) Any change in emissions; and~~
- ~~(4) Any permit term or condition that is no longer applicable as a result of the change.~~

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (A) A brief description of the change within the source;
- (B) The date on which the change will occur;
- (C) Any change in emissions; and
- (D) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- ~~(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~

6. Condition B.23 (now B.22) (Construction Permit Requirement) has been revised to address the correct rules for construction at a TV source. It was also revised because IDEM does not want a source to be liable for both a TV permit violation and a rule violation.

B.23 Construction Permit **Source Modification** Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction ~~shall be approved if required by and in accordance with~~ **is governed by** the applicable provisions of 326 IAC 2-7-10.5.

7. Condition B.26 (re-numbered as Condition B.25) (Annual Fee Payment) (b) has been revised.

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (b) ~~Failure~~ **Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action or revocation of this permit.

8. Condition B.27 (Enhanced New Source Review) has been deleted as follows:

~~B.27 Enhanced New Source Review [326 IAC 2]~~
~~The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.~~

9. Condition C.2(Opacity) has been revised to correctly reflect the rule language.

C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions **Alternative Opacity Limitations**), opacity shall meet the following, unless otherwise

stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

10. Condition C.4 (Incineration) has been revised to be consistent with wording in other conditions.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~The provisions of 326 IAC 9-1-2 are~~ is not federally enforceable.

11. Condition C.7 (Asbestos Abatement Projects) paragraph (e) has been revised to more accurately reflect the rule.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (e) Procedures for Asbestos Emission Control

The Permittee shall comply with the **applicable** emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are ~~mandatory~~ **applicable** for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

12. Condition C.8 (Performance Testing) has been rearranged for clarity as follows: Language has also been added to indicate that the test protocol and the notification of the test date do not require certification by the responsible official.

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~ **The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (b) **The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- ~~(b)(c)~~ **Pursuant to 326 IAC 3-6-4(b), all** All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by ~~Commissioner~~ **IDEM, OAM**, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

~~The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

13. Condition C.12 (now C.11)) (Monitoring Methods) has been revised to clarify that the monitoring and testing requirement are located in Section D of the permit.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing **required by Section D** ~~performed to meet the applicable requirements~~ of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

14. Condition C.17 (now C.16) (Emission Statement) language was added to clarify that emission statements should be certified by the responsible official and that regulated pollutants are defined in 326 IAC 2-7-1.

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants **(as defined by 326 IAC 2-7-1)** from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

15. Condition D.1.12 (now D.1.11) (Reporting Requirements) language has been added to clarify that the reports this condition refers to do not need to be certified by the responsible official as follows:

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1..1 and D.1.2(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. **The report submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

16. Emergency/Deviation Occurrence Report the rule cite 326 IAC 2-7-5(3)(c) should have been a capital C, 326 IAC 2-7-5(3)(C).

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- | | |
|----------|--|
| 9 | 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| 9 | 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) 326 IAC 2-7-5(3)(C)
C The Permittee must submit notice in writing within ten (10) calendar days |

17. The choice of affidavit has been added to the Certification form as follows:
18. A statement has been added to the Emergency/Deviation and Quarterly Report stating that these forms do not require a certification. The bottom of each of these forms now say “A certification is not required for this report”.
19. Quarterly has been changed to Semi-Annual Compliance Monitoring Report, language was added to clarify that reporting periods are based on calendar years as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
~~QUARTERLY~~ **SEMI-ANNUAL** COMPLIANCE MONITORING REPORT

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange, Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange, Indiana 46761
Part 70 Permit No.: T 087-j7661-00019

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted ~~quarterly~~ **semi-annually based on a calendar year**. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of Each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange, Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange, Indiana 46761
Part 70 Permit No.: T 087-7661-00019

This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ Affidavit (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and
information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange, Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange, Indiana 46761
Part 70 Permit No.: T 087-7661-00019

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 1200 North Detroit, LaGrange Indiana 46761
Mailing Address: 1200 North Detroit, LaGrange Indiana 46761
Part 70 Permit No.: T 087-7661-00019
Facility: EU Lamination and EU L-21
Parameter: Volatile Organic Compounds
Limit: Less than 25 tons per twelve (12) consecutive month period, for each facility

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month (tons of VOC)		Previous 11 Months (tons of VOC)		12 Month Total (tons of VOC)	
	Lamination	L-21	Lamination	L-21	Lamination	L-21

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Jayco, Inc.
Source Location: 1200 North Detroit, LaGrange, Indiana 46761
County: LaGrange
SIC Code: 3792
Operation Permit No.: T 087-7661-00019
Permit Reviewer: Frank P. Castelli

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Jayco, Inc. relating to the operation of a recreational vehicle manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) custom spray booth, known as EU SB-1, installed in 1995, equipped with air-assisted airless and air atomization spray applicators, equipped with dry filters for PM control, exhausted through Stack P35-A, maximum capacity to support the assembly lines.
- (b) One (1) lamination operation, known as EU Lamination, installed in 1995, exhausted in the building interior, maximum capacity to support the assembly lines.
- (c) One (1) woodworking operation, known as EU W-1, equipped with a cyclone for PM control, installed in 1995, including saws, routers and milling equipment, exhausted through Stack P32-K, capacity: 120 pounds of wood per hour.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (d) One (1) recreational vehicle assembly line, known as EU L-10, installed in 1993, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.

Jayco, Inc.
LaGrange, Indiana
Permit Reviewer:MES

Page 2 of 10
OP No. T 087-7661-00019

- (e) One (1) recreation vehicle assembly line, known as EU L-21, installed in 1992, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
 - (f) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
 - (g) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
 - (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
 - (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - (j) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
 - (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

- (l) Closed loop heating and cooling systems.
- (m) Infrared cure equipment.
- (n) Any of the following structural steel and bridge fabrication activities:
Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
- (o) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (p) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (q) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (r) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (s) Paved and unpaved roads and parking lots with public access.
- (t) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (u) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower.
 - (2) Diesel generators not exceeding 1,600 horsepower.
- (v) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (w) Other activities or categories not previously identified:
 - (1) Metal fabrication equipment
 - (2) Sewing
 - (3) Water based surface coating
 - (4) Chop saws and band saws
 - (5) Small paint touch-up guns, various designs

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following: list permits, registrations, modifications, exemptions, etc.

CP #087-3429-00019 issued January 17, 1995.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

There are no additional enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information was received on February 10, November 19, October 30, 1997 and September 14, 1998.

A notice of completeness letter was mailed to the source on February 20, 1997.

Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM ₁₀	less than 100
SO ₂	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential Emissions (tons/year)
Toluene	greater than 10
Ethylbenzene	less than 10
Xylenes	less than 10
MEK	less than 10
MIBK	less than 10
Hexane	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Jayco, Inc.
LaGrange, Indiana
Permit Reviewer:MES

Page 7 of 10
OP No. T 087-7661-00019

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 emissions provided by the applicant.

Pollutant	Actual Emissions (tons/year)
PM	0.095
PM ₁₀	0.095
SO ₂	0.019
VOC	30.1
CO	1.10
NO _x	4.41
Toluene	7.44
Ethylbenzene	0.183
Xylenes	0.845
MEK	0.239
MIBK	0.003
Hexane	4.60

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPS
assembly operation (EU L-10 & EU L-21), spray booth (EU SB-1) and lamination	1.00	1.00	0.000	68.1	0.000	0.000	45.3
woodworking (W-1)	0.469	0.469	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.00	5.00	1.00	5.00	2.00	3.00	2.00
Total Emissions	6.47	6.47	1.00	73.1	2.00	3.00	47.3

Jayco, Inc.
LaGrange, Indiana
Permit Reviewer:MES

Page 9 of 10
OP No. T 087-7661-00019

VOC emissions from assembly line EU L-21 and the Lamination operation EU Lamination are each limited to 24.0 tons per year to avoid the applicability of 326 IAC 8-1-6.

County Attainment Status

The source is located in **LaGrange** County.

Pollutant	Status
TSP	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. LaGrange County has been designated as attainment or unclassified for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60 applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to this source.

This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart JJ since the plant does not manufacture any products in the SIC codes listed in the definition of wood furniture. The wood components manufactured at this source are structural and are not considered furniture.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (100) tons per year of volatile organic compounds in LaGrange County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

- (a) The spray operations, the insignificant woodworking and welding activities shall comply with 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows: $E = 4.10 P^{0.67}$, where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour.

For process weights in excess of sixty thousand (60,000) pounds per hour, the following equation is used: $E = 55.0 P^{0.11} - 40$. Compliance for the spray operation will be obtained by the use of dry filters for overspray control.

- (b) For the woodworking operation, EU W-1, with a process weight rate of 120 pounds per hour, the PM limit is 0.623 pounds per hour (2.73 tons per year). The controlled potential PM emission rate from the woodworking operation is 0.107 pounds per hour (0.469 tons per year) and therefore the woodworking operation complies with this rule.

The cyclone, exhausted through Stack P32-K, shall be in operation at all times when the woodworking activities are in operation, in order to comply with this limit.

326 IAC 8-1-6 (New facilities; general reduction requirements)

The lamination booth EU Lamination, as well as the assembly line, EU L-21, have potential VOC emissions greater than twenty-five (25) tons per year and therefore could be subject to this rule. Jayco has agreed to limit the VOC emissions from each of these facilities to twenty-four (24) tons per year to avoid the applicability of this rule.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The VOC emissions from coating metal on the assembly lines, EU L-10 and EU L-21, will be limited to fourteen (14) pounds per day for each booth. Therefore, the requirements of this rule will not apply to the operations performed in these areas.

The existing permit limits the production in the custom spray booth, known as EU SB-1 to less than thirty-five (35) vehicles per day. Therefore this rule does not apply to metal painting performed in this booth.

Jayco, Inc.
LaGrange, Indiana
Permit Reviewer:MES

Page 12 of 10
OP No. T 087-7661-00019

326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

This rule does not apply to the operations at this source since the rule applies to sources that manufacture wood furnishings and this source does not manufacture wood furnishings.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The insignificant activity, degreasing operations are subject to the requirements of 326 IAC 8-3.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The assembly and surface coating operations have applicable compliance monitoring conditions as specified below:
 - (1) The amount of VOC delivered to the applicators in the assembly and surface coating operations, known as EU L-21 and EU Lamination, including cleanup solvents must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis.
 - (2) The amount of VOC delivered to the applicators when coating metal substrates in the assembly lines known as EU L-10 and EU L-21, including cleanup solvents must be monitored and recorded on a daily basis. This information must be reported to OAM on a quarterly basis.
 - (3) The number of vehicles coated by day in the custom spray booth, known as EU SB-1 must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-7 (Part 70).

- (b) The woodworking facilities have applicable compliance monitoring conditions as specified below:

- (1) Daily visible emissions notations of the woodworking facilities cyclone dust control exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (2) The cyclone dust control shall be operated with the woodworking facilities at all times.

These monitoring conditions are necessary to comply with the limits established in 326 IAC 6-3-2 (Process Operations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPS) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations on page 1 of 2 of Appendix A for air toxic calculations.

Conclusion

The operation of this recreational vehicle manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T 087-7661-00019.

Appendix A: Potential Emissions Calculations**Page 1 of 2 TSD App A****VOC and HAPS****From Surface Coating Operations****Company Name:** Jayco, Inc.**Address City IN Zip:** 1200 North Detroit, LaGrange, Indiana 46761**Part 70:** T 087-7661**Plt ID:** 087-00019**Reviewer:** Frank P. Castelli**Date:** December 13, 1996**Actual 1997 Emission Based on 2080 Hours of Operation (tons per y ear)**

	L10	L21	SB-1	Lamination	Entire Plant
Toluene	0.194	7.217	0.033	0.000	7.44
Ethylbenzene	0.045	0.105	0.033	0.000	0.183
Xylene	0.232	0.548	0.065	0.000	0.845
MEK	0.038	0.137	0.065	0.000	0.239
MIBK	0.001	0.002	0.000	0.000	0.003
Hexane	1.165	3.438	0.000	0.000	4.60
Total HAPs	1.674	11.447	0.195	0.000	13.3

VOC	4.124	20.512	0.650	0.000	25.3
-----	-------	--------	-------	-------	------

Potential Emissions Based on 8760 Hours of Operation (tons per y ear)

Toluene	0.815	30.396	0.137	N/A	31.3
Ethylbenzene	0.188	0.443	0.137	N/A	0.769
Xylene	0.977	2.309	0.274	N/A	3.56
MEK	0.158	0.576	0.274	N/A	1.01
MIBK	0.003	0.008	0.000	N/A	0.011
Hexane	4.908	14.479	0.000	N/A	19.4
Total HAPs	7.049	48.211	0.821	24.000	80.1
Total Limited HAPs	7.049	13.394	0.821	24.000	45.3

VOC	17.368	86.387	2.738	24.000	130.5
Limited VOC Emissions	17.368	24.000	2.738	24.000	68.1

Note Lamination Booth did not operate during 1997, therefore actual emissions were zero (0)

However, VOC emissions are limited to 24.0 TPY pursuant to CP 087-3429-00019, therefore VOC and HAPs were set equal to 24.0 TPY

Appendix A: Emission Calculations Baghouse Operations

Page 2 of 2 TSD App A

Company Name: Jayco, Inc.
Address City IN Zip: 1200 North Detroit, LaGrange, Indiana 46761
Part 70: T 087-7661
Plt ID: 087-00019
Reviewer: Frank P. Castelli
Date: December 13, 1996

Woodworking Cyclone W-1 Stack P32-K

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lbs/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lbs/hr)	Emission Rate after Controls (tons/yr)
W-1	97.00%	0.00125	10000.0	3.57	15.6	0.107	0.469

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)	Allowable Emissions (tons/yr)
4000	2.00	6.52	28.6

Methodology

Allowable Emissions = $4.10(\text{Process Weight Rate})^{0.67}$